

CONTAINS NO CBI



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EPA-OTS



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TOLUENE DIISOCYANATE
CAS 25471- 52- 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Comprehensive Assessment Information Rule
REPORTING FORM

89 JUL -5 PM 3:25
EPA-OTS
OFFICE

When completed, send this form to:

Document Processing Center
Office of Toxic Substances, TS-790
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460
Attention: CAIR Reporting Office

For Agency Use Only:

Date of Receipt: _____

Document
Control Number: _____

Docket Number: _____

PART A GENERAL REPORTING INFORMATION

CBI

- c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

CAS No. of chemical substance [][][][][][]-[][]-[][]

Name of chemical substance

CBI Manufacturer 1

Processor (3)

X/P manufacturer reporting for customer who is a processor 4

X/P processor reporting for customer who is a processor 5

3

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI

☐ Yes [XX] Go to question 1.04

☐ No [] Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI

☐ Yes As an impurity only 1

☐ No 2

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s)

☐ You have chosen to report for your customers

☒ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI

☐ Trade name N/A

☐ Is the trade name product a mixture? Circle the appropriate response.

Yes N/A 1

No N/A 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI

☐ "I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

William W. Downey
NAME

SIGNATURE

7/3/89
DATE SIGNED

Plant Manager

TITLE

(203) 323 - 2159

TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

N/A		
NAME	SIGNATURE	DATE SIGNED
N/A	()	
TITLE	TELEPHONE NO.	DATE OF PREVIOUS SUBMISSION

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI
[] "My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

NAME	SIGNATURE	DATE SIGNED
TITLE	() TELEPHONE NO.	

[] Mark (X) this box if you attach a continuation sheet.

PART B CORPORATE DATA

1.09 Facility Identification

CBI Name [A][M][E][R][I][C][A][N][] [C][Y][A][N][A][M][I][D][] [C][O][R][P][O][R][A][T][I][O][N][]
[] Address [S][H][I][P][P][A][N][] [P][I][A][N][T][] [2][0][5][] [M][A][G][E][E][]
Street
[S][T][A][M][E][N][D][O][N][] [] [] [] [] [] [] [] [] [] [] [] [] [] [] []
City
[C][T][] [0][6][9][0][2][]--[] [] [] []
State Zip
Dun & Bradstreet Number [1][4][]-[0][9][4][]-[7][3][4][3][]
EPA ID Number CTD..... [0][0][0][8][4][4][2][5][5][]
Employer ID Number 13. [0][4][3][0][8][9][0][9][]
Primary Standard Industrial Classification (SIC) Code [2][8][9][9][]
Other SIC Code [] [] [] []
Other SIC Code [] [] [] []

1.10 Company Headquarters Identification

CBI Name [A][M][E][R][I][C][A][N][] [C][Y][A][N][A][M][I][D][] [C][O][R][P][O][R][A][T][I][O][N][]
[] Address [A][M][E][] [C][Y][A][N][A][M][I][D][] [P][L][A][Z][A][] [] [] [] [] [] []
Street
[W][A][Y][N][E][] [] [] [] [] [] [] [] [] [] [] [] [] [] [] []
City
[N][] [] [] [] [] [] [] [] [] [] [] [] [] [] []
State Zip
Dun & Bradstreet Number [0][0][]-[2][1][5][]-[0][0][0][1][]
Employer ID Number 13. [0][7][3][0][8][9][0][9][]

[] Mark (X) this box if you attach a continuation sheet.

CBI

Name []

[][] Address []
Street

[]
City

[][] State [][][][][][] Zip --[][][][][]

Dun & Bradstreet Number[][][]-[][][][]-[][][][][]

CBI Name [W][I][L][I][A][M] [W][D][O][W][N][E][Y]
[] Title [P][L][A][N][T] [M][A][N][A][G][E][R]
Address [2][0][S] [M][A][G][E][E] [A][V][E]
Street
[S][T][A][N][F][O][R][D]
City
[C][T] [06902]--
State Zip
Telephone Number [2][0][3]-[3][2][3]-[2][1][5][0]

1.13 This reporting year is from 01 08 to 12 08
Mo. Year Mo. Year

7

[illegible][illegible]

8

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

☐

Classification

Quantity (kg/yr)

Manufactured

Imported

Processed (include quantity repackaged) 6840

Of that quantity manufactured or imported, report that quantity:

In storage at the beginning of the reporting year

For on-site use or processing

For direct commercial distribution (including export)

In storage at the end of the reporting year

Of that quantity processed, report that quantity:

In storage at the beginning of the reporting year 1536

Processed as a reactant (chemical producer) 6840

Processed as a formulation component (mixture producer)

Processed as an article component (article producer)

Repackaged (including export)

In storage at the end of the reporting year 1545

☐ Mark (X) this box if you attach a continuation sheet.

1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

[]

Component t Name	Value
1	1
2	1
3	1
4	1
5	1
6	1
7	1
8	1
9	1
10	1
11	1
12	1
13	1
14	1
15	1
16	1
17	1
18	1
19	1
20	1
21	1
22	1
23	1
24	1
25	1
26	1
27	1
28	1
29	1
30	1
31	1
32	1
33	1
34	1
35	1
36	1
37	1
38	1
39	1
40	1
41	1
42	1
43	1
44	1
45	1
46	1
47	1
48	1
49	1
50	1
51	1
52	1
53	1
54	1
55	1
56	1
57	1
58	1
59	1
60	1
61	1
62	1
63	1
64	1
65	1
66	1
67	1
68	1
69	1
70	1
71	1
72	1
73	1
74	1
75	1
76	1
77	1
78	1
79	1
80	1
81	1
82	1
83	1
84	1
85	1
86	1
87	1
88	1
89	1
90	1
91	1
92	1
93	1
94	1
95	1
96	1
97	1
98	1
99	1
100	1

Average %
Composition by Weight
(specify precision,
e.g., 45% \pm 0.5%)

Total	100%
-------	------

10

2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending [1][2] [8][7]
Mo. Year

Quantity manufactured 0 kg

Quantity imported 0 kg

Quantity processed 9122 kg

Year ending [1][2] [8][6]
Mo. Year

Quantity manufactured 0 kg

Quantity imported 0 kg

Quantity processed 6740 kg

Year ending [1][2] [8][5]
Mo. Year

Quantity manufactured 0 kg

Quantity imported 0 kg

Quantity processed 7126 kg

2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ Continuous process N/A 1

Semicontinuous process N/A 2

Batch process N/A 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

☐

Continuous process 1

Semicontinuous process 2

Batch process 3

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

CBI

☐

Manufacturing capacity kg/yr

Processing capacity kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

CBI

☐

	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase	_____	_____	_____
Amount of decrease	_____	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

- 2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

	<u>Days/Year</u>	<u>Average Hours/Day</u>
Process Type #1 (The process type involving the largest quantity of the listed substance.)		
Manufactured	_____	_____
Processed	<u>112</u>	<u>3</u>
Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)		
Manufactured	_____	_____
Processed	<u>20</u>	<u>3</u>
Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)		
Manufactured	_____	_____
Processed	_____	_____

- 2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

☐

Maximum daily inventory	<u>2500</u>	kg
Average monthly inventory	<u>1020</u>	kg

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

<u>CAS No.</u>	<u>Chemical Name</u>	<u>Byproduct, Coproduct or Impurity¹</u>	<u>Concentration (%) (specify \pm % precision)</u>	<u>Source of By-products, Coproducts, or Impurities</u>
<u>UK</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>

¹Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct
C = Coproduct
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to ☐ the instructions for further explanation and an example.)

CBI

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
L	100	100	I

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
L	100	100	I

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

☐

a.	b.	c.	d.
Product Type ¹	Final Product's Physical Form ²	Average % Composition of Listed Substance in Final Product	Type of End-Users ³
L	F1	Less than .1%	I

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the final product's physical form:

A = Gas	F2 = Crystalline solid
B = Liquid	F3 = Granules
C = Aqueous solution	F4 = Other solid
D = Paste	G = Gel
E = Slurry	H = Other (specify) _____
F1 = Powder	

³Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the
CBI listed substance to off-site customers.

<input type="checkbox"/>	Truck	N/A	1
	Railcar	N/A	2
	Barge, Vessel	N/A	3
	Pipeline	N/A	4
	Plane	N/A	5
	Other (specify)	N/A	6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers
CBI or prepared by your customers during the reporting year for use under each category
of end use listed (i-iv).

☐

Category of End Use

i. Industrial Products

Chemical or mixture	N/A	kg/yr
Article	N/A	kg/yr

ii. Commercial Products

Chemical or mixture	N/A	kg/yr
Article	N/A	kg/yr

iii. Consumer Products

Chemical or mixture	N/A	kg/yr
Article	N/A	kg/yr

iv. Other

Distribution (excluding export)	N/A	kg/yr
Export	N/A	kg/yr
Quantity of substance consumed as reactant	N/A	kg/yr
Unknown customer uses	N/A	kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

PART A GENERAL DATA

- 3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.
CBI The average price is the market value of the product that was traded for the listed substance.

☐

<u>Source of Supply</u>	<u>Quantity (kg)</u>	<u>Average Price (\$/kg)</u>
The listed substance was manufactured on-site.		
The listed substance was transferred from a different company site.		
The listed substance was purchased directly from a manufacturer or importer.		
The listed substance was purchased from a distributor or repackager.	6749	\$ 2.71
The listed substance was purchased from a mixture producer.		

- 3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

☐

Truck	1
Railcar	2
Barge, Vessel	3
Pipeline	4
Plane	5
Other (specify) _____	6

☐ Mark (X) this box if you attach a continuation sheet.

3.03 a. Circle all applicable containers used to transport the listed substance to your
CBI facility.

☐

Bags 1
Boxes 2
Free standing tank cylinders 3
Tank rail cars 4
Hopper cars 5
Tank trucks 6
Hopper trucks 7
Drums 8
Pipeline 9
Other (specify) _____ 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders mmHg
Tank rail cars mmHg
Tank trucks mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

☐

N.A. 26471-62-5 = 80/20 mixture

<u>Trade Name</u>	<u>Supplier or Manufacturer</u>	<u>Average % Composition by Weight (specify ± % precision)</u>	<u>Amount Processed (kg/yr)</u>
<u>TDI 80- 20</u>	<u>Monson Chem</u>	<u>100% 26471-62-5</u>	
<u>(A Mixture</u>	<u>Of 20% + 1.0</u>	<u>2,6 Toluene Diisocyanate</u>	
<u>and 80% + 1.0)</u>			

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the reporting year in the form of a class I chemical, class II chemical, or polymer, and the percent composition, by weight, of the listed substance.

☐

	Quantity Used (kg/yr)	% Composition by Weight of Listed Sub- stance in Raw Material (specify \pm % precision)
Class I chemical	6794	99.7 + UK
Class II chemical		
Polymer		

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

PART A PHYSICAL/CHEMICAL DATA SUMMARY

- 4.01 Specify the percent purity for the three major¹ technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

CBI

☐

	<u>Manufacture</u>	<u>Import</u>	<u>Process</u>
Technical grade #1	_____ % purity	_____ % purity	99.7 % purity
Technical grade #2	_____ % purity	_____ % purity	_____ % purity
Technical grade #3	_____ % purity	_____ % purity	_____ % purity

¹Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes ①

No 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company ①

Another source ②

☒ Mark (X) this box if you attach a continuation sheet.

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes 1

No (2)

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI

☐

Activity	Physical State				
	Solid	Slurry	Liquid	Liquified Gas	Gas
Manufacture	(1)	2	3	4	5
Import	1	2	3	4	5
Process	1	2	(3)	4	5
Store	(1)	2	3	4	5
Dispose	1	2	3	4	5
Transport	(1)	2	3	4	5

☐ Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles ≥ 10 microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

☐

<u>Physical State</u>		<u>Manufacture</u>	<u>Import</u>	<u>Process</u>	<u>Store</u>	<u>Dispose</u>	<u>Transport</u>
Dust	<1 micron			N/A			
	1 to <5 microns			N/A			
	5 to <10 microns			N/A			
Powder	<1 micron			N/A			
	1 to <5 microns			N/A			
	5 to <10 microns			N/A			
Fiber	<1 micron			N/A			
	1 to <5 microns			N/A			
	5 to <10 microns			N/A			
Aerosol	<1 micron			N/A			
	1 to <5 microns			N/A			
	5 to <10 microns			N/A			

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 5 ENVIRONMENTAL FATE

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) U K (1/M cm) at _____ nm
Reaction quantum yield, ϕ U K at _____ nm
Direct photolysis rate constant, k_p , at ... U K 1/hr _____ latitude

b. Oxidation constants at 25°C:

For 1O_2 (singlet oxygen), k_{ox} U K 1/M hr
For RO_2 (peroxy radical), k_{ox} U K 1/M hr

c. Five-day biochemical oxygen demand, BOD_5 ... U K mg/l

d. Biotransformation rate constant:

For bacterial transformation in water, k_b ... U K 1/hr
Specify culture U K

e. Hydrolysis rate constants:

For base-promoted process, k_b U K 1/M hr
For acid-promoted process, k_A U K 1/M hr
For neutral process, k_N U K 1/hr

f. Chemical reduction rate (specify conditions) U K

g. Other (such as spontaneous degradation) ... U K

☐ Mark (X) this box if you attach a continuation sheet.

PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

<u>Media</u>	<u>Half-life (specify units)</u>
Groundwater	<u>U K</u>
Atmosphere	<u>U K</u>
Surface water	<u>U K</u>
Soil	<u> </u>

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

<u>CAS No.</u>	<u>Name</u>	<u>Half-life (specify units)</u>	<u>Media</u>
<u>U K</u>	<u> </u>	<u> </u>	<u>in</u>
<u> </u>	<u> </u>	<u> </u>	<u>in</u>
<u> </u>	<u> </u>	<u> </u>	<u>in</u>
<u> </u>	<u> </u>	<u> </u>	<u>in</u>

5.03 Specify the octanol-water partition coefficient, K_{ow} ... U K at 25°C

Method of calculation or determination U K

5.04 Specify the soil-water partition coefficient, K_d U K at 25°C

Soil type U K

5.05 Specify the organic carbon-water partition coefficient, K_{oc} U K at 25°C

5.06 Specify the Henry's Law Constant, H U K atm-m³/mole

☐ Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

<u>Bioconcentration Factor</u>	<u>Species</u>	<u>Test</u> ¹
U K	U K	UK

¹Use the following codes to designate the type of test:

F = Flowthrough
S = Static

☐ Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of
CBI the listed substance sold or transferred in bulk during the reporting year.

☐

<u>Market</u>	<u>Quantity Sold or Transferred (kg/yr)</u>	<u>Total Sales Value (\$/yr)</u>
Retail sales	_____	_____
Distribution -- Wholesalers	_____	_____
Distribution -- Retailers	_____	_____
Intra-company transfer	_____	_____
Repackagers	_____	_____
Mixture producers	_____	_____
Article producers	_____	_____
Other chemical manufacturers or processors	_____	_____
Exporters	_____	_____
Other (specify) _____	_____	_____

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist
for the listed substance and state the cost of each substitute. A commercially
feasible substitute is one which is economically and technologically feasible to use
CBI in your current operation, and which results in a final product with comparable
performance in its end uses.

☐

<u>Substitute</u>	<u>Cost (\$/kg)</u>
U K	_____
_____	_____
_____	_____
_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

General Instructions:

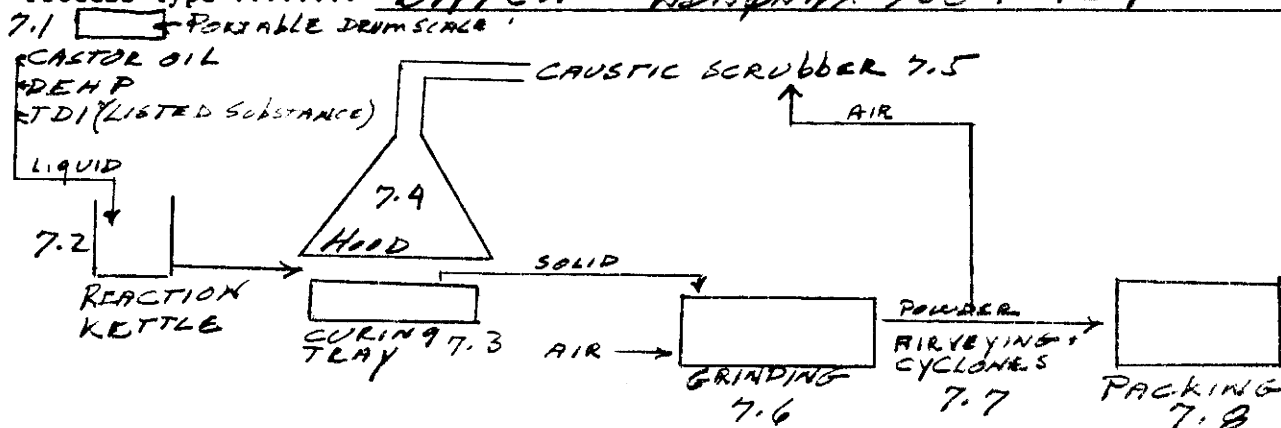
For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

7.01 In accordance with the instructions, provide a process block flow diagram showing the major (greatest volume) process type involving the listed substance.

CBI

☐ Process type BATCH ADAPHAX 758 + 759



☐ Mark (X) this box if you attach a continuation sheet.

7.03 In accordance with the instructions, provide a process block flow diagram showing all process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if not treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

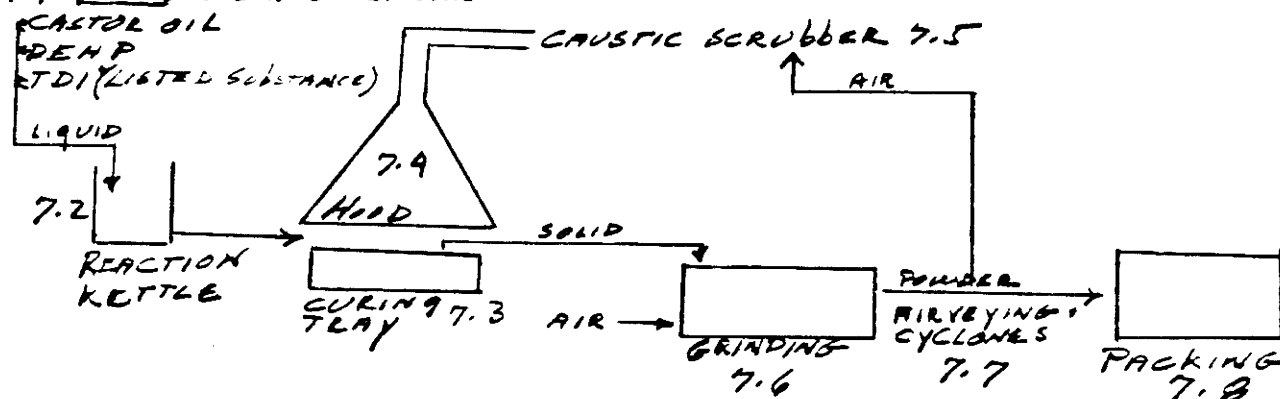
☐ Process type Batch - see block diagram at 7.01

Vapors of listed substance are drawn through a caustic scrubber.

CBI

☐ Process type BATCH ADAPNAX 758 + 759

7.1 ☐ PORTABLE DRUMS



☐ Mark (X) this box if you attach a continuation sheet.

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Batch

<u>Unit Operation ID Number</u>	<u>Typical Equipment Type</u>	<u>Operating Temperature Range (°C)</u>	<u>Operating Pressure Range (mm Hg)</u>	<u>Vessel Composition</u>
<u>7.1</u>	<u>Portable Drum</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u></u>
	<u>Scale</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u></u>
<u>7.2</u>	<u>Mixing Kettle</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Steel</u>
<u>7.3</u>	<u>Tray Approx 3x4</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Aluminum</u>
<u>7.4</u>	<u>Hood</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Fiberglass</u>
<u>7.5</u>	<u>Scrubber</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Fiberglass</u>
<u>7.6</u>	<u>Attritor Mills</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Steel</u>
<u>7.7</u>	<u>Ducts + Cyclones</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>S. Steel</u>
<u>7.8</u>	<u>Drum Packer</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>+ Fiberglass Steel</u>

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Batch

<u>Process Stream ID Code</u>	<u>Process Stream Description</u>	<u>Physical State¹</u>	<u>Stream Flow (kg/yr)</u>
7.1	Ingredients Added	OL	
	From Drums		
7.2	Reaction Kettle	OL	6462
7.3	AL Curing tray	OL-SO	6462
7.4	Air + Odor	G U	
7.5	10% Caustic Scrubber	A L	
7.6	Attritor Mills	S O	6462
7.7	Ducts + S.S. Cyclones	S O	6462
7.8	Drum Packer	S O	6462

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☐ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type Batch Adaphax 758

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds ¹	Concentrations ^{2,3} (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7.1	Castor Oil	57.5 %		
+	DEHP	28.7 %		
7.2	TDI- 80-20	13.8%		
7.3	Adaphax 758			
7.6	Polyurethane Resin	71.3%		
7.7	DEHP	28.7%		
7.8				
7.4	U K	U K		

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

7.06 (continued)

¹For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
1	N/A	
	N/A	
	N/A	
2	N/A	
	N/A	
	N/A	
3	N/A	
	N/A	
	N/A	
4	N/A	
	N/A	
	N/A	
5	N/A	
	N/A	
	N/A	

²Use the following codes to designate how the concentration was determined:

A = Analytical result
E = Engineering judgement/calculation

³Use the following codes to designate how the concentration was measured:

V = Volume
W = Weight

☐ Mark (X) this box if you attach a continuation sheet.

PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.01.

CBI

☐ Process type BATCH NO RESIDUALS

☐ Mark (X) this box if you attach a continuation sheet.

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

¹Use the following codes to designate the type of hazardous waste:

I = Ignitable
C = Corrosive
R = Reactive
E = EP toxic
T = Toxic
H = Acutely hazardous

²Use the following codes to designate the physical state of the residual:

GC = Gas (condensable at ambient temperature and pressure)
GU = Gas (uncondensable at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

³ For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
1	N/A	
	N/A	
	N/A	
2	N/A	
	N/A	
	N/A	
3	N/A	
	N/A	
	N/A	
4	N/A	
	N/A	
	N/A	
5	N/A	
	N/A	
	N/A	

⁴ Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

⁵Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

⁶Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

<u>Code</u>	<u>Method</u>	<u>Detection Limit</u> <u>(± ug/l)</u>
<u>1</u>	<u>N/A</u>	<u></u>
<u>2</u>	<u>N/A</u>	<u></u>
<u>3</u>	<u>N/A</u>	<u></u>
<u>4</u>	<u>N/A</u>	<u></u>
<u>5</u>	<u>N/A</u>	<u></u>
<u>6</u>	<u>N/A</u>	<u></u>

☐ Mark (X) this box if you attach a continuation sheet.

CBI

[illegible]

²Use the codes provided in Exhibit 8-2 to designate the management methods

58

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

<u>Incinerator</u>	<u>Combustion Chamber Temperature (°C)</u>		<u>Location of Temperature Monitor</u>		<u>Residence Time In Combustion Chamber (seconds)</u>	
	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>
<u>1</u>	_____	_____	_____	_____	_____	_____
<u>2</u>	_____	_____	_____	_____	_____	_____
<u>3</u>	_____	_____	_____	_____	_____	_____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

<u>Incinerator</u>	<u>Air Pollution Control Device¹</u>	<u>Types of Emissions Data Available</u>
<u>1 N/A</u>	_____	_____
<u>2 N/A</u>	_____	_____
<u>3 N/A</u>	_____	_____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

¹Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)

E = Electrostatic precipitator

O = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

☐

Data Element	Data are Maintained for:		Year in Which Data Collection Began	Number of Years Records Are Maintained
	Hourly Workers	Salaried Workers		
Date of hire	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T+ 8</u>
Age at hire	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T + 8</u>
Work history of individual ** before employment at your facility	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T+8</u>
Sex	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Race	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Job titles	<u>X</u>	<u>X</u>	<u>X</u>	<u>T+8</u>
Start date for each job title	<u>X</u>	<u>X</u>	<u>X</u>	<u>T+ 8</u>
End date for each job title	<u>X</u>	<u>X</u>	<u>X</u>	<u>T + 8</u>
Work area industrial hygiene monitoring data	<u>X</u>	<u>X</u>	<u>1985</u>	<u>PERMANENT</u>
Personal employee monitoring data	<u>X</u>	<u>X</u>	<u>1985</u>	<u>PERMANENT</u>
Employee medical history	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T + 8</u>
Employee smoking history	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Accident history	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T + 8</u>
Retirement date	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T + 8</u>
Termination date	<u>X</u>	<u>X</u>	<u>1968</u>	<u>T + 8</u>
Vital status of retirees	<u>X</u>	<u>X</u>	<u>1985</u>	<u>PERMANENT</u>
Cause of death data	<u>X</u>	<u>X</u>	<u>1985</u>	<u>PERMANENT</u>

* T= Termination

** = If on employee application

☐ Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

a.	b.	c.	d.	e.
<u>Activity</u>	<u>Process Category</u>	<u>Yearly Quantity (kg)</u>	<u>Total Workers</u>	<u>Total Worker-Hours</u>
Manufacture of the listed substance	Enclosed	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Controlled Release	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Open	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
On-site use as reactant	Enclosed	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Controlled Release	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Open	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
On-site use as nonreactant	Enclosed	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Controlled Release	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Open	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
On-site preparation of products	Enclosed	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Controlled Release	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
	Open	<u> </u>	<u> </u>	<u> </u>

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Sr. Operator, White Department

B

Operator, White Department

C

D

E

F

G

H

I

J

☐ Mark (X) this box if you attach a continuation sheet.

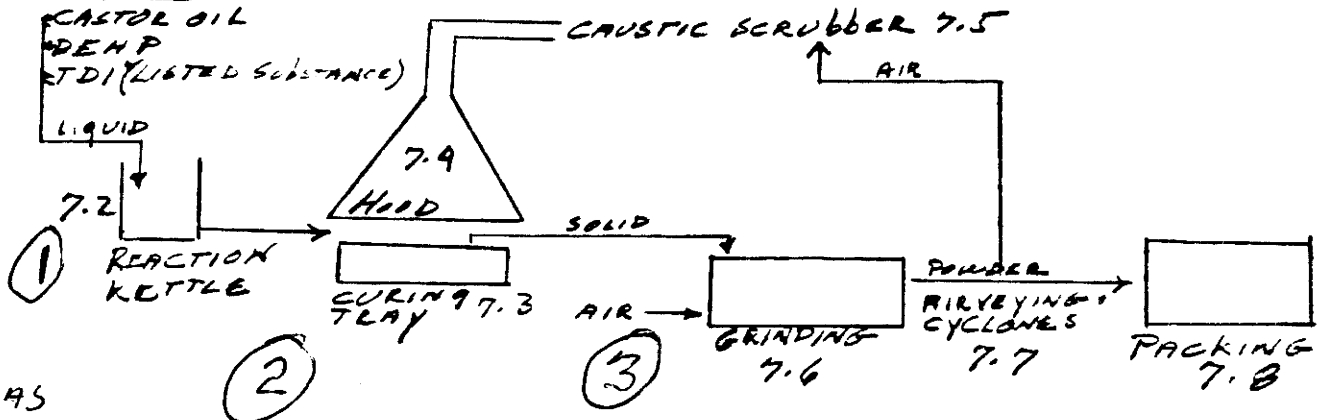
9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

CBI

☐ Process type BATCH ADAPHA 758 + 759

7.1 ☐ PORTABLE DRUM SCALE

CASTOR OIL
DENP
TDI (LISTED SUBSTANCE)
LIQUID



☐ Mark (X) this box if you attach a continuation sheet.

9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type _____

Work Area ID

Description of Work Areas and Worker Activities

1	Workers weigh and add TDI to reactor
2	Workers drain reactor to curing trays
3	Workers cut and place product (solid)
4	in chute to grinding
5	
6	
7	
8	
9	
10	

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☐ Process type BATCH

Work area ... ①

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>A</u>	<u>1</u>	<u>INHALATION</u>	<u>OL</u>	<u>A</u>	<u>66</u>

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)	SY = Sludge or slurry
GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)	AL = Aqueous liquid
SO = Solid	OL = Organic liquid
	IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less	D = Greater than 2 hours, but not exceeding 4 hours
B = Greater than 15 minutes, but not exceeding 1 hour	E = Greater than 4 hours, but not exceeding 8 hours
C = Greater than one hour, but not exceeding 2 hours	F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type BATCH

Work area

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>IT</u>	<u>1</u>	<u>INHALATION</u>	<u>OL</u>	<u>A</u>	<u>66</u>
<u>B</u>	<u>2</u>	<u>INHALATION</u>	<u>OL</u>	<u>A</u>	<u>66</u>

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)	SY = Sludge or slurry
GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)	AL = Aqueous liquid
SO = Solid	OL = Organic liquid
	IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less	D = Greater than 2 hours, but not exceeding 4 hours
B = Greater than 15 minutes, but not exceeding 1 hour	E = Greater than 4 hours, but not exceeding 8 hours
C = Greater than one hour, but not exceeding 2 hours	F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type BATCH

Work area ③

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>B</u>	<u>2</u>	<u>INHALATION</u>	<u>SO</u>	<u>B</u>	<u>66</u>

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)	SY = Sludge or slurry
GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)	AL = Aqueous liquid
SO = Solid	OL = Organic liquid
	IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less	D = Greater than 2 hours, but not exceeding 4 hours
B = Greater than 15 minutes, but not exceeding 1 hour	E = Greater than 4 hours, but not exceeding 8 hours
C = Greater than one hour, but not exceeding 2 hours	F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

[] Process type BATCH

Work area1.....

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type BATCH

Work area .. (2)

Labor Category	8-hour TWA Exposure Level (ppm, mg/m ³ , other-specify)	15-Minute Peak Exposure Level (ppm, mg/m ³ , other-specify)
<u>A</u>	<u>.0008 ppm</u>	<u>UK</u>
<u>B</u>	<u>.0008 ppm</u>	<u>UK</u>

☐ Mark (X) this box if you attach a continuation sheet.

CBI

Work area (13)

☐ Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

<u>Sample/Test</u>	<u>Work Area ID</u>	<u>Testing Frequency (per year)</u>	<u>Number of Samples (per test)</u>	<u>Who Samples¹</u>	<u>Analyzed In-House (Y/N)</u>	<u>Number of Years Records Maintained</u>
Personal breathing zone	1, 2, + 3	1	7-8	D	Y	PERMANENT
General work area (air)						
Wipe samples						
Adhesive patches						
Blood samples						
Urine samples						
Respiratory samples						
Allergy tests						
Other (specify)						
Other (specify)						
Other (specify)						

¹Use the following codes to designate who takes the monitoring samples:

- A = Plant industrial hygienist
- B = Insurance carrier
- C = OSHA consultant
- D = Other (specify) Chemical Group Industrial Hygienist

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and CBI analytical methodology used for each type of sample.

<input type="checkbox"/> Sample Type	Sampling and Analytical Methodology
Personal Breathing Zone	Personal air monitoring pump with glass fiber filter treated with 1- (2- pyridyl) - piperazine sample and analyzed by liquid chromatography
General work area	Air monitoring pump and glass fiber filter treated with 1- (2- pyridyl) piperazine and analyzed by liquid chromatography

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

CBI

<input type="checkbox"/> Equipment Type ¹	Detection Limit ²	Manufacturer	Averaging Time (hr)	Model Number
D	Depends on the vol sample of air	filter (millipore) pump (Gilian)	8HR 1/4 HR	HFS-113A

¹Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify) Glass fiber filter treated with 1-(2-pyridyl)- piperazine with Gilian model 113 A pump.

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) _____
- I = Other (specify) _____

²Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter (μm^3)

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency
(weekly, monthly, yearly, etc.)

N/A

☐

Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type

Work area ..1.....

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	20 +	U K	Y	1986
General dilution				
Other (specify)				
<hr/>				
Vessel emission controls	11 Years	1978		
Mechanical loading or packaging equipment				
Other (specify)				
<hr/>				

* Caustic Scrubber

☒ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Batch

Work area ²

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	_____	_____	_____	_____
General dilution	_____	_____	_____	_____
Other (specify)				
<u>Caustic Scrubber</u>	<u>11 Yrs.</u>	<u>1978</u>	<u>N</u>	_____
Vessel emission controls	_____	_____	_____	_____
Mechanical loading or packaging equipment	_____	_____	_____	_____
Other (specify)				
_____	_____	_____	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Batch

Work area ³

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	_____	_____	_____	_____
General dilution	_____	_____	_____	_____
Other (specify)				
_____	_____	_____	_____	_____
Vessel emission controls	_____	_____	_____	_____
Mechanical loading or packaging equipment	_____	_____	_____	_____
Other (specify)				
<u>Caustic Scrubber</u>	<u>11 Yrs</u>	<u>1978</u>	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type BATCH

Work area . ①

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)
<u>LOCAL ELEPHANT TRUNK EXHAUST</u>	<u>U.K.</u>
<u>DUCTED TO THE CAUSTIC</u>	
<u>SCRUBBER</u>	

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type BATCH

Work area ¹ 1

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators	<u>N</u>
Safety goggles/glasses	<u>Y</u>
Face shields	<u>N</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>N</u>
Other (specify)	
_____	_____
_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Batch

Work area 2 2

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators	<u>N</u>
Safety goggles/glasses	<u>Y</u>
Face shields	<u>N</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>N</u>
Other (specify)	
_____	_____
_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Batch

Work area 3 3

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators	<u>N</u>
Safety goggles/glasses	<u>Y</u>
Face shields	<u>N</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>N</u>
Other (specify)	
_____	_____
_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type BATCH

Work Area	Respirator Type	Average Usage ¹	Fit Tested (Y/N)	Type of Fit Test ²	Frequency of Fit Tests (per year)
<u>1</u>	<u>FULL FACE RESP.</u>	<u>E</u>	<u>Y</u>	<u>PL</u>	<u>1</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

¹Use the following codes to designate average usage:

A = Daily
B = Weekly
C = Monthly
D = Once a year
E = Other (specify) Twice/ Week

²Use the following codes to designate the type of fit test:

QL = Qualitative
QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this CBI question and complete it separately for each process type and work area.

☐

Process type BATCH

Work area (3) SAFETY TRAINING

MSDS SHEETS - WORKER MONITORING

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type BATCH

Work area (3)

<u>Housekeeping Tasks</u>	<u>Less Than Once Per Day</u>	<u>1-2 Times Per Day</u>	<u>3-4 Times Per Day</u>	<u>More Than 4 Times Per Day</u>
Sweeping	<u>N.A.</u>			
Vacuuming				
Water flushing of floors	<u>NA*</u>			
Other (specify)				

* LISTED SUBSTANCE DOES NOT SPILL
THIS AREA

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type BATCH

Work area (2) SAFETY TRAINING

MDS SHEETS - WORKER MONITORING

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type BATCH

Work area 2

<u>Housekeeping Tasks</u>	<u>Less Than Once Per Day</u>	<u>1-2 Times Per Day</u>	<u>3-4 Times Per Day</u>	<u>More Than 4 Times Per Day</u>
Sweeping	<u>X</u>			
Vacuuming				
Water flushing of floors	<u>X</u>			
Other (specify)				

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type BATCH

Work area (D) SAFETY TRAINING

MSDS SHEETS - DRUM STORAGE AREA

MARKED WITH WARNING SIGNS - WORKER

MONITORING

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type BATCH

Work area (!)

Housekeeping Tasks	Less Than Once Per Day	1-2 Times Per Day	3-4 Times Per Day	More Than 4 Times Per Day
Sweeping	<u>X</u>			
Vacuuming				
Water flushing of floors	<u>X</u>			
Other (specify)				

☐ Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

Yes 1

No 2

Emergency exposure

Yes 1

No 2

If yes, where are copies of the plan maintained?

Routine exposure: _____

Emergency exposure: _____

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

Yes 1

No 2

If yes, where are copies of the plan maintained? _____

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

Yes 1

No 2

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

Plant safety specialist 1

Insurance carrier 2

OSHA consultant 3

Other (specify) _____ 4

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 10 ENVIRONMENTAL RELEASE

General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- | | | |
|--------------------------|---|----|
| <input type="checkbox"/> | Industrial area | 1 |
| | Urban area | 2 |
| | Residential area | 3 |
| | Agricultural area | 4 |
| | Rural area | 5 |
| | Adjacent to a park or a recreational area | 6 |
| | Within 1 mile of a navigable waterway | 7 |
| | Within 1 mile of a school, university, hospital, or nursing home facility | 8 |
| | Within 1 mile of a non-navigable waterway | 9 |
| | Other (specify) _____ | 10 |

☐ Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude 41 ° 2 ' 31 "

Longitude 73 ° 31 ' 44 "

UTM coordinates Zone _____, Northing _____, Easting _____

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation inches/year

Predominant wind direction

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of CBI Y, N, and NA.)

☐

On-Site Activity	Environmental Release		
	Air	Water	Land
Manufacturing			
Importing			
Processing	N	N	N
Otherwise used			
Product or residual storage			
Disposal			
Transport			

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

Quantity discharged to the air	<u>0 N/A</u>	kg/yr ± <u> </u> %
Quantity discharged in wastewaters	<u>0 N/A</u>	kg/yr ± <u> </u> %
Quantity managed as other waste in on-site treatment, storage, or disposal units	<u>0 N/A</u>	kg/yr ± <u> </u> %
Quantity managed as other waste in off-site treatment, storage, or disposal units	<u>N/A</u>	kg/yr ± <u> </u> %

☐ Mark (X) this box if you attach a continuation sheet.

10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type BATCH

<u>Stream ID Code</u>	<u>Control Technology</u>	<u>Percent Efficiency</u>
7.5	Caustic Scrubber	UK *

* Assumed to be 100% since listed substance is destroyed immediately upon contact with water.

☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

Process type Batch

Point Source
ID Code

Description of Emission Point Source

N/A

N/A

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

114

10.10 Emission Characteristics -- Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

<input type="checkbox"/> Point Source ID Code	Physical State ¹	Average Emissions (kg/day)	Frequency ² (days/yr)	Duration ³ (min/day)	Average Emission Factor ⁴	Maximum Emission Rate (kg/min)	Maximum Emission Rate Frequency (events/yr)	Maximum Emission Rate Duration (min/event)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

¹Use the following codes to designate physical state at the point of release:
G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) _____

²Frequency of emission at any level of emission

³Duration of emission at any level of emission

⁴Average Emission Factor -- Provide estimated (\pm 25 percent) emission factor (kg of emission per kg of production of listed substance)

CBI

[]

¹Height of attached or adjacent building

³Use the following codes to designate vent type:

V = Vertical

115

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09. Photocopy this question and complete it separately for each emission point source.

CBI

☐

Point source ID code N/A

Size Range (microns)

Mass Fraction (% \pm % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.

PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Batch

Percentage of time per year that the listed substance is exposed to this process type 18 %

Equipment Type	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					
	Less than 5%	5-10%	11-25%	26-75%	76-99%	Greater than 99%
Pump seals ¹						
Packed	N/A	N/A	N/A	N/A	N/A	N/A
Mechanical	N/A	N/A	N/A	N/A	N/A	N/A
Double mechanical ²	N/A	N/A	N/A	N/A	N/A	N/A
Compressor seals ¹	N/A	N/A	N/A	N/A	N/A	N/A
Flanges	N/A	N/A	N/A	N/A	N/A	N/A
Valves						
Gas ³	N/A	N/A	N/A	N/A	N/A	N/A
Liquid						18%
Pressure relief devices ⁴ (Gas or vapor only)	N/A	N/A	N/A	N/A	N/A	N/A
Sample connections						
Gas	N/A	N/A	N/A	N/A	N/A	N/A
Liquid	N/A	N/A	N/A	N/A	N/A	N/A
Open-ended lines ⁵ (e.g., purge, vent)						
Gas	N/A	N/A	N/A	N/A	N/A	N/A
Liquid	N/A	N/A	N/A	N/A	N/A	18%

¹List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

²If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

³Conditions existing in the valve during normal operation

⁴Report all pressure relief devices in service, including those equipped with control devices

⁵Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

CBI

☐

a. Number of Pressure Relief Devices	b. Percent Chemical in Vessel ¹	c. Control Device	d. Estimated Control Efficiency ²
N/A			

¹Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

²The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type N/A

<u>Equipment Type</u>	<u>Leak Detection Concentration (ppm or mg/m³) Measured at _____Inches from Source</u>	<u>Detection Device¹</u>	<u>Frequency of Leak Detection (per year)</u>	<u>Repairs Initiated (days after detection)</u>	<u>Repairs Completed (days after initiated)</u>
Pump seals					
Packed	_____	_____	_____	_____	_____
Mechanical	_____	_____	_____	_____	_____
Double mechanical	_____	_____	_____	_____	_____
Compressor seals	_____	_____	_____	_____	_____
Flanges	_____	_____	_____	_____	_____
Valves					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Pressure relief devices (gas or vapor only)	_____	_____	_____	_____	_____
Sample connections					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Open-ended lines					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____

¹Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

Listed substance (raw materials) is stored in closed 55 gallon drums. Product has no listed substance.

10.16 Raw Material, Intermediate and Product Storage Emissions - - Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block flow diagram(s).

CBI

☐

Vessel Type ¹	Floating Roof ² Seals ²	Composition of Stored Materials ³	Throughput (liters per year)	Vessel Filling Rate (gpm)	Vessel Filling Duration (min)	Vessel Inner Diameter (m)	Vessel Height (m)	Operating Vessel Volume (l)	Vessel Emission Controls ⁴	Design Flow Rate ⁵	Vent Diameter (cm)	Control Efficiency (%)	Basis for Estimate ⁶

¹Use the following codes to designate vessel type:

F = Fixed roof
 CIF = Contact internal floating roof
 NCIF = Noncontact internal floating roof
 EFR = External floating roof
 P = Pressure vessel (indicate pressure rating)
 H = Horizontal
 U = Underground

²Use the following codes to designate floating roof seals:

MS1 = Mechanical shoe, primary
 MS2 = Shoe-mounted secondary
 MS2R = Rim-mounted, secondary
 LM1 = Liquid-mounted resilient filled seal, primary
 LM2 = Rim-mounted shield
 LMW = Weather shield
 VM1 = Vapor mounted resilient filled seal, primary
 VM2 = Rim-mounted secondary
 VMW = Weather shield

³Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

⁴Other than floating roofs

⁵Gas/vapor flow rate the emission control device was designed to handle (specify flow rate units)

⁶Use the following codes to designate basis for estimate of control efficiency:

C = Calculations
 S = Sampling

☐ Mark (X) this box if you attach a continuation sheet.

PART E NON-ROUTINE RELEASES

No non routine releases.

- 10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

<u>Release</u>	<u>Date Started</u>	<u>Time (am/pm)</u>	<u>Date Stopped</u>	<u>Time (am/pm)</u>
<u>1</u>	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
<u>2</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>3</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>4</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>5</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>6</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

- 10.24 Specify the weather conditions at the time of each release.

<u>Release</u>	<u>Wind Speed (km/hr)</u>	<u>Wind Direction</u>	<u>Humidity (%)</u>	<u>Temperature (°C)</u>	<u>Precipitation (Y/N)</u>
<u>1</u>	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>2</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>3</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>4</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>5</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>6</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

☐ Mark (X) this box if you attach a continuation sheet.

APPENDIX I: List of Continuation Sheets

Attach continuation sheets for sections of this form and optional information after this page. In column 1, clearly identify the continuation sheet by listing the question number to which it relates. In column 2, enter the inclusive page numbers of the continuation sheet for each question number.

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.



OCEAN Network

EMERGENCY PHONE 1-800-OLIN-911

**MATERIAL
SAFETY DATA**

4.02

SECTION I - IDENTIFICATION

MSDS FILE 563

CHEMICAL NAME & SYNONYMS Toluene Diisocyanate 80-20		
CHEMICAL FAMILY Isocyanate	FORMULA $C_9H_6N_2O_2$	PRODUCT TDI 80-20
DESCRIPTION Clear water white to pale yellow liquid with sharp pungent odor		CAS NO. 26471-62-5

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Harmful if swallowed. Avoid contact with eyes, skin or clothing. Upon contact with skin or eyes, wash off with water. Avoid breathing mist or vapor. Protect against physical damage. Store in a cool, dry, well-ventilated place, away from areas where a fire hazard may be acute. Outside or detached storage is preferred. Blanket storage tanks with inert gas (nitrogen) or dry air. Separate from oxidizing materials.	
PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
EYES Goggles	As required to keep airborne concentrations below TLV
GLOVES Rubber, NBR or PVA	
OTHER Coveralls, impervious footwear	

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
*Toluene-2,4-diisocyanate (80%) CAS No.: 584-84-9	0.005 ppm TWA 0.02 ppm STEL	5.8 g/kg (rat)	10 ppm/4 hrs (mouse)	Skin, eye, mucous membrane irritation. Pulmonary irritant. Allergic sensitization to skin and respiratory tract. May cause asthma attacks.
*Toluene-2,6-diisocyanate(20%), CAS No.: 91-08-7	None established	No data	11 ppm/4 hrs-mouse	Irritation

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 270°F COC METHOD	OSHA CLASSIFICATION Not Regulated (Ignitable)	FLAMMABLE EXPLOSIVE LIMIT	LOWER 0.9%	UPPER 9.5%
EXTINGUISHING MEDIA Water, carbon dioxide or dry chemical. Use water to keep the exposed containers cool.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved positive pressure self-contained breathing apparatus when any material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 0.005 ppm TWA, 0.02 ppm STEL - 2,4 TDI (ACGIH 1987-88)
Symptoms of Over Exposure May cause irritation to eyes, throat, lungs, stomach, skin. Allergic sensitization to skin and respiratory tract. May cause asthma attacks
EMERGENCY FIRST-AID PROCEDURES
SKIN Immediately flush thoroughly with water for 15 minutes, call a physician.
EYES Immediately flush thoroughly with water for 15 minutes, call a physician.
INGESTION Immediately drink large quantities of water to dilute.
INHALATION Immediately remove victim to fresh air. Call a physician.

PRODUCT CODE

898859

CHEMICAL NAME TDI 80-20

SECTION VI - TOXICOLOGY (PRODUCT)

ACUTE ORAL LD 50 5.8 g/kg (rats). Harmful if swallowed.**ACUTE DERMAL LD 50**
> 2 g/kg (rabbits)**ACUTE INHALATION LC 50**
10 ppm/4 hrs (mouse)**CARCINOGENICITY** Oral Exposure-Positive NTP Bioassay**MUTAGENICITY** Not known to be mutagenic**EYE IRRITATION** Irritation and/or burns**PRIMARY SKIN IRRITATION**

Irritation and/or burns

PRINCIPAL ROUTES OF ABSORPTION

Inhalation, dermal contact

EFFECTS OF ACUTE EXPOSURE May cause irritation to lungs, eyes, throat, stomach, skin. Allergic sensitization of skin and respiratory tract. Corneal injury may occur.**EFFECTS OF CHRONIC EXPOSURE** Damage/allergic sensitization to lungs. Inhalation studies indicate not carcinogenic. Carcinogenic risk from industrial use is not significant.

SECTION VII - SPILL AND LEAKAGE PROCEDURES (CONTROL PROCEDURES)

ACTION FOR MATERIAL RELEASE OR SPILL

Wear NIOSH/MSHA approved positive pressure supplied air respirator. Follow OSHA regulations for respirator use (see 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add dry non-combustible absorbent, sweep up material and place in an approved DOT container. Add an equal amount of neutralizing solution to the container (90-95% water, 5-10% ammonia). Clean remaining surfaces with neutralizing solution and add this to container. Isolate container in a well-ventilated place and do not seal for 24 hrs. Ammonia vapors may be generated until solution is neutralized. Wash all contaminated clothing before reuse. In the event of a large spill use the telephone number shown on the front of this sheet.

TRANSPORTATION EMERGENCY, CONTACT CHEMTREC 800-424-9300

THE MIXTURE OR TRADE NAME PRODUCT HEREIN CONTAINS A TOXIC CHEMICAL(S) SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372. THE SARA 313 CHEMICALS ARE LISTED IN SECTION III AND ARE INDICATED BY AN ASTERISK (*).

SECTION VIII - SHIPPING DATA

D.O.T. Toluene diisocyanate Poison B UN 2078

SECTION IX - REACTIVITY DATA

STABLE X **UNSTABLE** AT C F**HAZARDOUS**

POLYMERIZATION

MAY OCCUR

X

WILL NOT OCCUR**CONDITIONS TO AVOID**

Water or incompatible materials in a closed system, excess heat

INCOMPATIBILITY (MATERIAL TO AVOID)

Acids, bases and alcohols, surface active materials

HAZARDOUS DECOMPOSITION PRODUCTS

Carbon monoxide, nitrogen oxides, hydrogen cyanide

SECTION X - PHYSICAL DATA

MELTING POINT 53-56°F	VAPOR PRESSURE .01mmHg, 20°C	VOLATILES No data
BOILING POINT 484°F	SOLUBILITY IN WATER Insoluble	EVAPORATION RATE No data
SPECIFIC GRAVITY (H2O=1) 1.22	PH No data	VAPOR DENSITY (AIR=1) 6.0

INFORMATION: FURNISHED TO**FURNISHED BY DATE** APRIL 28, 1989

ATTN: DEPT HANDLING MATL SAFETY DATA SHEETS
MR. DOWNEY
AMERICAN CYANAMID
205 MCGEE AVE.

STAMFORD CT06902

Olin MSDS Control Group
(203) 356-3449

Olin CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

OCEAN® Network**EMERGENCY PHONE 1-800-OLIN-911**

MATERIAL SAFETY DATAMSDS NO. 0452-02
CAS NO. 67700-43-0
DATE: 04/29/87**PRODUCT IDENTIFICATION**

TRADE NAME:	ADAPHAX® 758 Polyurethane
SYNONYMS:	Urethane resin
CHEMICAL FAMILY:	Urethane
MOLECULAR FORMULA:	Polymer
MOLECULAR WGT.:	Polymer

WARNING**WARNING! HARMFUL IF INHALED****CHRONIC HAZARD WARNINGS****CONTAINS MATERIAL WHICH CAUSED CANCER IN LABORATORY ANIMAL TESTS****OSHA REGULATED COMPONENTS**

COMPONENT	CAS. NO.	%	TWA/CEILING	REFERENCE
Di-2-ethylhexyl-phthalate	000117-81-7	28.75	5 mg/M3	OSHA/ACGIH IARC/NTP

NFPA HAZARD RATING

Fire	0
Health	1
Reactivity	0
Special	-

FIRE: Materials that will not burn.
HEALTH: Materials which on exposure would cause irritation but only minor residual injury even if no treatment is given
REACTIVITY: Materials which in themselves are normally stable, even under fire exposure conditions, and which are not reactive with water.

HEALTH HAZARD INFORMATION**EFFECTS OF OVEREXPOSURE:**

Overexposure to this material is not likely to cause significant acute toxic effects.
Di-2-ethylhexylphthalate caused liver cancer in male and female rats and mice fed a diet of 6,000 or 12,000 ppm and 3,000 or 6,000 ppm, respectively for 2 years.
Di-2-ethylhexylphthalate caused changes in the liver cells of mice and rats at higher concentrations and were not found at lower dose levels. If these changes do not occur, then it is unlikely that tumors will be formed. Also these liver changes seem to be unique to rodents as shown by Di-2-ethylhexylphthalate metabolism studies comparing rats and primates.
Di-2-ethylhexylphthalate was nonmutagenic in the Ames assay, and did not induce chromosomal changes in human and animal cells.
Di-2-ethylhexylphthalate did induce a nondose-dependant, but significant increase in sister chromatid exchanges in Chinese hamster cells. A single i.p. dose of 12.7-25.5 g/kg induced a small but significant dominant lethal effect in male mice.

FIRST AID:

In case of skin contact, wash affected areas of skin with soap and water.
In case of eye contact, immediately irrigate with plenty of water for 15 minutes.

EMERGENCY PHONE: 201/835-3100

AMERICAN CYANAMID COMPANY, 1 CYANAMID PLAZA, WAYNE, NEW JERSEY 07470

If vapor or dust of this material is inhaled, remove from exposure. Administer oxygen if there is difficulty in breathing.

**EXPOSURE
CONTROL METHODS**

Engineering controls are not usually necessary, if good hygiene practices are strictly followed. Before eating, drinking or smoking, wash face and hands thoroughly with soap and water. Wear the following as necessary to prevent skin contact: impervious gloves. For operations where eye or face contact can occur wear chemical splash-proof goggles. Where concentrations are below the PEL, no respiratory protection is required. For spills or leaks, such protection may be necessary. Where exposures exceed PEL use respirator approved by NIOSH for the material and level of exposure. See "GUIDE TO INDUSTRIAL RESPIRATORY PROTECTION" (NIOSH).

ADAPHAX® 758 Polyurethane**FIRE AND
EXPLOSION
HAZARD
INFORMATION**

FLASH POINT:	Not Applicable
FLAMMABLE LIMITS (% BY VOL):	Not Applicable
AUTOIGNITION TEMP:	Not Available
DECOMPOSITION TEMP:	Not Available
FIRE FIGHTING:	This material will not burn. Use an extinguishing media appropriate for the surrounding fire. Wear self-contained, positive pressure breathing apparatus.

REACTIVITY DATA

STABILITY:	Stable
CONDITIONS TO AVOID:	None known
POLYMERIZATION:	Will Not Occur
CONDITIONS TO AVOID:	None known
INCOMPATIBLE MATERIALS:	Strong oxidizing agents.
HAZARDOUS DECOMPOSITION PRODUCTS:	Thermal decomposition or combustion may produce carbon monoxide and/or carbon dioxide.

**PHYSICAL
PROPERTIES**

APPEARANCE AND ODOR:	White powder
BOILING POINT:	Not Applicable
MELTING POINT:	Not Applicable
VAPOR PRESSURE:	Negligible at 20 C
VAPOR DENSITY:	Negligible at 20 C
% VOLATILE (BY VOL):	Not Applicable
OCTANOL/H ₂ O PARTITION COEF.:	Not Applicable
pH:	Not Applicable
SATURATION IN AIR (BY VOL):	Not Available
EVAPORATION RATE:	Not Applicable
SOLUBILITY IN WATER:	Negligible

**SPILL OR LEAK
PROCEDURES**

STEPS TO BE TAKEN IN
CASE MATERIAL IS
RELEASED OR SPILLED:

Sweep up spills and place in a waste disposal container. Flush area
with water.

WASTE DISPOSAL

Disposal must be made in accordance with applicable governmental
regulations.

**SPECIAL
PRECAUTIONS**

HANDLING AND
STORAGE/OTHER:

Maintain good housekeeping to control dust accumulations.

**D.O.T. SHIPPING
INFORMATION**

PROPER SHIPPING
NAME:

HAZARDOUS SUBSTANCE,
SOLID, N.O.S.

HAZARD CLASS:

ORM-E

UN/NA:

NA9188

D.O.T. HAZARDOUS
SUBSTANCES:

(Reportable Quantity of Product)
DI-2-ETHYLHEXYLPHthalate (3.5 lbs.-28.8%)

D.O.T. LABEL REQUIRED: None

**TSCA
INFORMATION**

This product is manufactured in compliance with all provisions of the
Toxic Substances Control Act, 15 U.S.C.

**ENVIRONMENTAL
INFORMATION**

The following components are defined as toxic chemicals subject to reporting requirements of
Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

COMPONENT	CAS. NO.	%	SARA TITLE III			RCRA	TSCA 12B
			TPQ (lbs.)	RQ (lbs.)	S313		
Di-2-ethylhexyl- phthalate	000117-81-7	28.75	NONE	1	YES	U028	NO

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA

ACUTE (N) CHRONIC (Y) FIRE (N) REACTIVE (N) PRESSURE (N)

Marvin A. Friedman, Ph.D., Director of Toxicology and Product Safety

This information is given without any warranty or representation. We do not assume any legal responsibility for same,
nor do we give permission, inducement, or recommendation to practice any patented invention without a license.
It is offered solely for your consideration, investigation and verification. Before using any product read its label.



MATERIAL SAFETY DATA

MSDS NO. 3659-02
CAS NO. 67700-43-0
DATE: 04/29/87

PRODUCT IDENTIFICATION

TRADE NAME: **ADAPHAX® 759 Polyurethane**
SYNONYMS: Urethane resin
CHEMICAL FAMILY: Urethane polymer
MOLECULAR FORMULA: Polymer
MOLECULAR WGT.: Polymer

WARNING

WARNING! HARMFUL IF INHALED

CHRONIC HAZARD WARNINGS

CONTAINS MATERIAL WHICH CAUSED CANCER IN LABORATORY ANIMAL TESTS

OSHA REGULATED COMPONENTS

COMPONENT	CAS. NO.	%	TWA/CEILING	REFERENCE
Di-2-ethylhexylphthalate	000117-81-7	15.07	5 mg/M3	OSHA/ACGIH IARC/NTP

NFPA HAZARD RATING

Fire	0	FIRE: Materials that will not burn.
Health	1	HEALTH: Materials which on exposure would cause irritation but only minor residual injury even if no treatment is given
Reactivity	0	REACTIVITY: Materials which in themselves are normally stable, even under fire exposure conditions, and which are not reactive with water.
Special	-	

HEALTH HAZARD INFORMATION

EFFECTS OF OVEREXPOSURE: Overexposure to this material is not likely to cause significant acute toxic effects.
Di-2-ethylhexylphthalate caused liver cancer in male and female rats and mice fed a diet of 6,000 or 12,000 ppm and 3,000 or 6,000 ppm, respectively for 2 years.
Di-2-ethylhexylphthalate caused changes in the liver cells of mice and rats at higher concentrations and were not found at lower dose levels. If these changes do not occur, then it is unlikely that tumors will be formed. Also these liver changes seem to be unique to rodents as shown by Di-2-ethylhexylphthalate metabolism studies comparing rats and primates.
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AMERICAN CYANAMID COMPANY, 1 CYANAMID PLAZA, WAYNE, NEW JERSEY 07470

ADAPHAX® 759 Polyurethane

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CONTROL METHODS**

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**FIRE AND
EXPLOSION
HAZARD
INFORMATION**

FLASH POINT:	Not Applicable
FLAMMABLE LIMITS (% BY VOL):	Not Applicable
AUTOIGNITION TEMP:	Not Available
DECOMPOSITION TEMP:	Not Available
FIRE FIGHTING:	This material will not burn. Use an extinguishing media appropriate for the surrounding fire. Wear self-contained, positive pressure breathing apparatus.

REACTIVITY DATA

STABILITY:	Stable
CONDITIONS TO AVOID:	None known
POLYMERIZATION:	Will Not Occur
CONDITIONS TO AVOID:	None known
INCOMPATIBLE MATERIALS:	Strong oxidizing agents.
HAZARDOUS DECOMPOSITION PRODUCTS:	Thermal decomposition or combustion may produce carbon monoxide and/or carbon dioxide.

**PHYSICAL
PROPERTIES**

APPEARANCE AND ODOR:	White powder
BOILING POINT:	Not Applicable
MELTING POINT:	Not Applicable
VAPOR PRESSURE:	Negligible at 20 C
SPECIFIC GRAVITY:	1.01
VAPOR DENSITY:	Negligible at 20 C
% VOLATILE (BY VOL):	Not Applicable
OCTANOL/H ₂ O PARTITION COEF.:	Not Applicable
pH:	Not Applicable
SATURATION IN AIR (BY VOL):	Not Available
EVAPORATION RATE:	Not Applicable
SOLUBILITY IN WATER:	Negligible

SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

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WASTE DISPOSAL

Disposal must be made in accordance with applicable governmental regulations.

SPECIAL PRECAUTIONS

HANDLING AND STORAGE/OTHER:

Maintain good housekeeping to control dust accumulations.

D.O.T. SHIPPING INFORMATION

PROPER SHIPPING NAME:

HAZARDOUS SUBSTANCE,
SOLID, N.O.S.

HAZARD CLASS:

ORM-E

UN/NA:

NA9188

D.O.T. HAZARDOUS SUBSTANCES:

(Reportable Quantity of Product)
DI-2-ETHYLHEXYLPHTHALATE (6.4 lbs.-15.1%)

D.O.T. LABEL REQUIRED: None

TSCA INFORMATION

This product is manufactured in compliance with all provisions of the Toxic Substances Control Act, 15 U.S.C.

ENVIRONMENTAL INFORMATION

The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

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			TPQ (lbs.)	RQ (lbs.)	S313		
Di-2-ethylhexyl-phthalate	000117-81-7	15.07	NONE	1	YES	U028	NO

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA

ACUTE (N) CHRONIC (Y) FIRE (N) REACTIVE (N) PRESSURE (N)

Marvin A. Friedman, Ph.D., Director of Toxicology and Product Safety

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STAMFORD, CT 06902

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